



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 7, 2022

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte,*
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to provide the Government's proposed pretrial schedule. *See* D.E. 711 at 2. The Government sent its proposed schedule for pretrial disclosures to the defendant and to standby counsel on February 21, 2022, *see* Ex. A, and has received no responses.

The Government proposes the following schedule for pretrial disclosures. The Court has already issued an order for other pretrial deadlines.

April 8, 2022:	Deadline for defendant's disclosures pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure
	Deadline for defendant's notice, if any, pursuant to Rules 12.1, 12.2, and 12.3, and for notice of any other affirmative defense
	Deadline for defendant's compliance with the Court's order dated January 13, 2020 (D.E. 248) in connection with any asserted advice-of-counsel defense
May 13, 2022:	Government to provide proposed trial exhibits and material pursuant to 18 U.S.C. § 3500
	Defendant to provide witness statements pursuant to Rule 26.2

We note that the defendant was provided with proposed exhibits and 3500 material in connection with the February 3, 2020 trial. The Government will update those prior disclosures in accordance with the disclosure schedule set by the Court.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
David W. Denton, Jr./Michael D. Lockard
Assistant United States Attorneys
(212) 637-2744/-2193

cc: Standby Counsel (by ECF)
Joshua Adam Schulte (by mail)

EXHIBIT A



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 21, 2022

BY MAIL

Joshua Adam Schulte
Reg. No. 79471-054
MDC Brooklyn
P.O. Box 329002
Brooklyn, NY 11232

**Re: *United States v. Joshua Adam Schulte,*
S3 17 Cr. 548 (JMF)**

Dear Mr. Schulte:

Pursuant to the Court's order dated February 15, 2022 (D.E. 711) directing, among other things, that the Government "provide to Defendant and Standby Counsel a proposed detailed pretrial schedule (including, for example, deadlines for the disclosure of Government's Exhibits, 3500 material, Rule 16(b) and 26.2 disclosures, etc.)."

The Government proposes the following schedule for pretrial disclosures. The Court has already issued an order for other pretrial deadlines, *see id.*

April 8, 2022: Deadline for defendant's disclosures pursuant to Rule 16(b) of the
Federal Rules of Criminal Procedure

Deadline for defendant's notice, if any, pursuant to Rules 12.1, 12.2,
and 12.3, and for notice of any other affirmative defense

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January 13, 2020 (D.E. 248) in connection with any asserted advice-
of-counsel defense

May 13, 2022: Government to provide proposed trial exhibits and material pursuant to
18 U.S.C. § 3500

Defendant to provide witness statements pursuant to Rule 26.2

cc: Standby counsel (by email)